

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

MICHELLE MOVE, individually and on behalf
of all others similarly situated,

Plaintiff,

v.

NEW CIBO VITA, LLC,

Defendant.

Case No.: 2:25-cv-04148-MEF-AME

**STIPULATION AND PROPOSED
ORDER TO EXTEND TIME TO
RESPOND TO COMPLAINT**

Plaintiff Michelle Move (“Plaintiff”) and Defendant New Cibo Vita, LLC (“Cibo Vita” or “Defendant”), through their respective counsel, stipulate as follows:

WHEREAS, on May 12, 2025, Plaintiff filed the Complaint in the above-captioned action (ECF No. 1);

WHEREAS, on May 15, 2025, Counsel for Defendant accepted service of the summons and the Complaint;

WHEREAS, under Federal Rule of Civil Procedure 12(a)(1)(A)(i), Defendant’s current deadline to respond to the Complaint is June 5, 2025;

WHEREAS, counsel for Plaintiff and Defendant have agreed to extend the time for Defendant to answer the Complaint to and including July 17, 2025;

WHEREAS, no party has made any requests for an extension of time within which to make a submission to the Court or for an adjournment of a conference or to excuse an appearance with the Court;

THEREFORE, Plaintiff and Defendant hereby stipulate and agree, by and through their respective undersigned counsel, that Defendant’s deadline to answer, move against, or otherwise respond to the Complaint is extended to and including July 17, 2025.

Dated: May 19, 2025

By: /s/ Philip L. Fraietta
Philip L. Fraietta

BURSOR & FISHER, P.A.

Joseph I. Marchese (*pro hac vice* forthcoming)
Philip L. Fraietta (Bar No. 118322014)
Eleanor R. Grasso (*pro hac vice* forthcoming)
1330 Avenue of the Americas, 32nd Floor
New York, NY 10019
Telephone: (646) 837-7150
Facsimile: (212) 989-9163
Email: jmarchese@bursor.com
pfraietta@bursor.com
egrasso@bursor.com

Attorneys for Plaintiff

Dated: May 19, 2025

By: /s/ Liza M. Walsh
Liza M. Walsh

WASLH PIZZI O'REILLY FALANGA LLP

Liza M. Walsh
Jessica K. Formichella
100 Mulberry Street, 15th Floor
Newark, New Jersey 07102
Telephone: (973) 757-1015
Email: lwalsh@walsh.law
jformichella@walsh.law

Attorney for Defendant

SO ORDERED.

Dated: Newark, New Jersey

_____, 2025

UNITED STATES DISTRICT JUDGE
MICHAEL E. FARBIARZ